

## Spencer & Associates

5956 Sherry Lane, Suite 2000  
Dallas, Texas 75225

October 14, 2021

BY ECF and EMAIL

Honorable Lorna G. Schofield  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: 21-cr-138, United States v. Jimmy Gale Watson, Jr., Unopposed Request for  
Variance to Conditions for Release

Dear Judge Schofield:

Please accept this letter motion on behalf of Jimmy Gale Watson for a temporary variance to the Conditions of Release issued by this Court regarding Mr. Watson's travel.

Mr. Watson currently is limited to travel between his home district in the Northern District of Texas and the Southern District of New York. Mr. Watson's probation Officer reports that Mr. Watson has not had any violations of any terms of the Conditions of Release since being placed under supervision on March 9, 2021.

Mr. Watson is a veteran, having completed tours of duty in the United States Navy and the United States Marine Corp. This Court previously granted Mr. Watson permission to travel and participate in Operation Restored Warrior, a Christian-based program designed to help combat veterans recover from the negative effects of combat on June 24-28, 2021. Mr. Watson has been invited to participate in a second retreat sponsored by the same organization. The second retreat is in Louisville, Kentucky on October 31 to November 3, 2021.

I respectfully request that this Court approve a one-time variance from the Conditions of Release and allow Mr. Watson to travel to and from the District of Kentucky in order to attend the Operation Restored Warrior session during October 31-November 3, 2021. Mr. Watson and his counsel have contacted his supervising Probation Officer in the Northern District of Texas and the Assistant United States Attorney in the Southern District of New York, and both have indicated their consent to this variance.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Arnold A. Spencer".

Arnold A. Spencer

Counsel for Jimmy Gale Watson, Jr.

Cc: Kiersten Fletcher, AUSA - SDNY  
Elizabeth Hanft, AUSA - SDNY  
Jaime Espinosa, USPO - NDTX